

AUG 10 2004
[Handwritten Signature]

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

PER _____
DEPUTY CLERK

Edward R. Coss, Jr., : CASE NO. 1:CV 01-0878
Petitioner, :
Vs. : JUDGE(S) CALDWELL, BLEWITT
JAMES MORGAN, Superintendent @ :
SCI SMITHFIELD, et al., :
Respondents. :

MOTION TO APPOINT COUNSEL
PURSUANT TO 18 U.S.C. §3006(a)(2)(B)¹

AND NOW COMES the Petitioner, Edward R. Coss, Jr., in
propria persona, averring the following forthwith:

1. The Petitioner has filed a valid writ of habeas corpus
pursuant to 28 U.S.C. §2254 with this Honorable Court.
2. The Petitioner requests this Honorable Court to appoint
counsel pursuant to 18 U.S.C. §3006(a)(2)(b) to assist with the
hereinabove petition and in support thereof he avers the following:

- (a) the interest of justice standard requires
appointment of counsel, hence, the Petitioner'
claim raised in said writ has arguable merit,
an evidentiary hearing should be warranted and
Petitioner is unable to afford counsel.

WHEREFORE, Petitioner requests counsel be appointed.

Respectfully submitted:

[Handwritten Signature]
Edward R. Coss, Jr.
In propria persona
Inmate No.: CB 5970
P.O. BOX 256
WAYMART, PA. 18472

¹ In addition to the appointment of counsel, the Petitioner requests
that counsel is ordered to amend the writ. However, if counsel is not
appointed in this case, the Petitioner requests he be granted leave to
file an amended writ, as well as a brief in support of his claims.

ERIC COSS
118-55 Church St
Scranton PA 18507-2666

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U.S. Court House
U.S. District Court, Middle District of Pa.
Clerk's Office
335 N Washington Ave.
P.O. Box 11418
Scranton PA 18501

